Presentment Date: September 4, 2015 at 12:00 noon

Objection Date: September 1, 2015

## **BECKER & POLIAKOFF LLP**

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Attorneys for Defendants The Lazarus-Schy Family Partnership, A Florida General Partnership, The Schy Family Partnership, A Florida General Partnership, Zipora Lazarus, Ira Schy, Rose Schy, Michael Lazarus, Jared Lazarus, Terry Lazarus, Linda Lazarus, Ida Lazarus, Elan Schy, Lisa Schy, Steve Schy, Doran Schy, B. S., A Minor, J. S., A Minor, M. S., A Minor, And Abe Schy, As An Individual, And As Custodian For B. S., J. S., And M. S.

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION, Adv. Pro. No. 08-1789 (SMB) Plaintiff-Applicant, SIPA LIQUIDATION v. BERNARD L. MADOFF INVESTMENT (Substantively Consolidated) SECURITIES LLC, Defendant. In re: BERNARD L. MADOFF. Debtor. IRVING H. PICARD, Trustee for the Liquidation of Adv. Pro. No. 10-05190 (SMB) Bernard L. Madoff Investment Securities LLC Plaintiff. v. THE LAZARUS-SCHY FAMILY PARTNERSHIP, a Florida general partnership, et al., Defendants.

NOTICE OF PRESENTMENT OF AN ORDER GRANTING APPLICATION TO WITHDRAW AS COUNSEL

PLEASE TAKE NOTICE that, upon the annexed Declaration of Helen Davis Chaitman in Support of Application on Consent for an Order to Withdraw as Counsel, dated August 28, 2015, Helen Davis Chaitman of Becker & Poliakoff LLP, attorney of record for Defendants The Lazarus-Schy Family Partnership, A Florida General Partnership, The Schy Family Partnership, A Florida General Partnership, The Schy Family Partnership, A Florida General Partnership, The Schy, Michael Lazarus, Jared Lazarus, Terry Lazarus, Linda Lazarus, Ida Lazarus, Elan Schy, Lisa Schy, Steve Schy, Doran Schy, B. S., A Minor, J. S., A Minor, M. S., A Minor, And Abe Schy, As An Individual, And As Custodian For B. S., J. S., And M. S., (the "BP Defendants"), will present the attached proposed order to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge at the United States Bankruptcy Court for the Southern District of New York at One Bowling Green, New York, NY 10004, for signature on September 4, 2015 at 12:00 noon.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed order, with proof of service, is filed with the Clerk of the Court and copies of such objection are served so as to be delivered to the undersigned, along with counsel to the Trustee, and a courtesy copy is delivered to the Bankruptcy Judge's chambers at least three days before the date of presentment, there will not be a hearing and the order may be signed.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, the Court will notify the moving and objecting parties of the date and time of the hearing and of the moving party's obligation to notify all other parties entitled to receive notice. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

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Dated: August 28, 2015

New York, New York

## **BECKER & POLIAKOFF LLP**

By: /s/ Helen Davis Chaitman

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45 Broadway

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Minor, M. S., A Minor, And Abe Schy, As An Individual, And As Custodian For B.

S., J. S., And M. S.

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